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Attorney for WELLS FARGO BANK, N.A.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:	§	CASE NO. 19-59740-WLH
	§	
KEIDRA AIESHA ALI-GADSON	§	
	§	
Debtor(s)	§	CHAPTER 13

**RESPONSE OF WELLS FARGO BANK, N.A. TO DEBTOR'S MOTION TO SELL
PROPERTY (DOCKET #36)**

COMES NOW, WELLS FARGO BANK, N.A. (hereafter "Respondent"), a secured creditor in the above referenced Bankruptcy Case and files this Response to Debtor's Motion Sell Property (hereafter "Debtor's Motion") and shows the Court as follows:

1. Respondent admits the allegations in Paragraphs 1 through 4 of Debtor's Motion.
2. Respondent is without sufficient information to admit or deny the allegations in Paragraphs 5 through 9 of Debtor's Motion.
3. Respondent does not not oppose the sale if the following conditions are met and included in any order from this Court authorizing the sale of the Property:
 - a. The lien of WELLS FARGO BANK, N.A. and/or its assigns or successors in interest shall attach to the sales proceeds of the property.
 - b. The sale proceeds shall be distributed to pay in full the outstanding balance on the loan owed to WELLS FARGO BANK, N.A. and/or its assigns or successors in interest as of the date of closing, which shall be within 90 days of entry of an order granting Debtor's Motion.

- c. If there are not sufficient funds to pay the indebtedness in full, WELLS FARGO BANK, N.A. and/or its assigns or successors in interest, then the sale shall not close unless prior approval of such short sale is received in writing from WELLS FARGO BANK, N.A. Otherwise, the Debtor shall be required to seek further appropriate orders from this Court.
- d. The closing agent is ordered to pay the full claim of WELLS FARGO BANK, N.A. and/or its assigns or successors in interest directly before any funds are paid to the Debtor, or any other party not having priority over the lien of WELLS FARGO BANK, N.A. and/or its assigns or successors in interest.

WHEREFORE, PREMISES CONSIDERED, Respondent prays that this Court allow Debtor's Motion only if the conditions stated in Paragraph 3 of this Response are included in an order from this Court authorizing the sale of the Property, and for any and such further relief to which Respondent may be justly entitled.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on August 28, 2020, a true and correct copy of the foregoing RESPONSE OF WELLS FARGO BANK, N.A. TO DEBTOR'S MOTION TO SELL PROPERTY was served via electronic means as listed on the Court's ECF noticing system or by regular first class mail to the parties listed on the attached list.

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